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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider
Staff Proposal Concerning Revision or
Repeal of General Orders and Utility
Reporting Requirements.

R.15-12-006
(Filed: December 3, 2015)

**PACIFIC GAS & ELECTRIC COMPANY RESPONSE TO SCOPING MEMO
AND RULING REQUESTING ADDITIONAL COMMENTS ON STAFF
PROPOSAL CONCERNING REVISIONS OR REPEAL OF GENERAL ORDERS
AND UTILITY REPORTING REQUIREMENT**

SHIRLEY A. WOO

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-2248
Facsimile: (415) 973-5520
E-Mail: SAW0@pge.com

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: September 29, 2016

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The California Public Utilities Commission (Commission) issued Order Instituting Rulemaking (R.) 15-12-006 on December 17, 2015, to consider its staff proposal seeking to revise or repeal certain utility reporting requirements and General Orders (GOs) and to correct a publishing error in one GO. On September 8, 2016 the Assigned Commissioner issued a Scoping Memo for the proceeding (Scoping Memo) and requested additional comment on Items 5, 6, 9, 14, and 23 the staff proposal.

PG&E submits the following response to the request for additional comments proposed in section 8 of the Scoping Memo. PG&E's responses are limited to answering the questions proposed in Section 8.1, 8.3 and 8.4 that are directed at PG&E.

8.1 Item 5 of Staff Proposal: Advanced Metering Infrastructure Reports

Item 5 of the Staff Proposal proposes repealing quarterly and annual Advanced Metering Infrastructure (AMI) reports for PG&E, SDG&E, and Southern California Edison Company (SCE). According to the Staff Proposal, these reporting requirements are found in Decision (D.) 06-07-027 for PG&E, D.07-04-043 for SDG&E, and D.08-09-039 for SCE.

- 1. Would adoption of Item 5 modify PG&E's reporting requirements set forth in D.06-07-027? If so, specify which reporting requirement(s) would be affected?*
- 2. SDG&E specific question.*
- 3. SCE Specific question.*
- 4. Would adoption of Item 5 affect utility reporting requirements other than those imposed by D.06-07-027? If so, specify the relevant reporting requirement and the source of the requirement (e.g., the Commission decision or order that imposed the requirement).*
- 5. In PG&E's comments to the SFI-8 PG&E supported elimination of the AMI Report stating that "PG&E's requirement was approved for elimination in [the] 2014 [General Rate Case]." Specify what AMI reporting requirement for PG&E was approved for*

elimination and provide citations to the Commission decisions or orders that imposed and eliminated this reporting requirement.

6. *Does PG&E provide the Commission with information regarding AMI installations in reports that would remain unaffected by the adoption of Item 5? If so, describe these reports, including the Commission decision or order that imposed the reporting requirement.*

PG&E's Responses To Questions Addressed To It In 8.1 Item 5: Advanced Metering Infrastructure Reports:

1. Yes, staff has proposed to repeal the reporting requirement. However, PG&E has completed the reporting requirements in D.06-07-027. (See responses to questions 4 and 5 below.) PG&E discontinued reporting on AMI deployment (Steering Committee Update Reports and AMI Deployment Reports) upon AMI project completion in December of 2013. PG&E filed its final SmartMeter Steering Committee Update Report in June 2014 and its final AMI Deployment Report in December 2014.
2. N/A
3. N/A
4. No. The 2014 PG&E GRC Decision, D.14-08-032 already repealed the referenced reporting requirements. (See response to Question 5.)
5. 2014 GRC Decision (D.14-08-032), p. 8, bullet point 6 under the Customer Care section states: "*The SmartMeter program reporting requirements are concluded*". This decision language was in response to PG&E's 2014 GRC application requesting that all AMI and SmartMeter Upgrade decisions' reporting requirements related to deployment be discontinued as of January 2014 due to the completion of the AMI/SmartMeter deployment and its transition to normal operations.^{1/}
6. Yes, the Smart Grid Reports (adopted in D.12-04-025) provide updates on smart grid deployment.

8.3 Item 9 of Staff Proposal: Quarterly Reports on Installed Customer Generation

Item 9 of the Staff Proposal proposes to repeal the quarterly reports on installed customer generation required of PG&E, SCE, and SDG&E pursuant to D.03-04-030 and Resolution E-3831. SCE, PG&E, and SDG&E have already filed advice letters requesting, among other things, relief from the quarterly reporting requirement adopted in D.03-04-030 and Resolution E-3831. The Energy Division approved these advice letters on May 16, 2016. This ruling seeks comment on the following:

1/ PG&E's 2014 GRC Prepared Testimony, Exhibit (PG&E-5), p. 10-10 to 10-11.

1. *Is Item 9 of the Staff Proposal moot in light of the Energy Division's approval of SCE Advice Letter 3263-E/E-A, PG&E Advice Letter 4743-E/E-A, and SDG&E Advice Letter 2778-E/E-A/E-B?*

PG&E's Response To 8.3 Item 9 of Staff Proposal: Quarterly Reports on Installed Customer Generation:

In Advice Letter 4743-E/E-A PG&E provided notice to the Commission that it will no longer provide the quarterly report to the Energy Division and CEC of the amount of customer generation installed under the provisions of D.03-04-030 because such reports were no longer needed. PG&E agrees that with the approval of Advice Letter 4743-E/E-A, staff proposal item 9, is no longer relevant and can be removed from the list of recommendations.

8.4 Item 14 of Staff Proposal: PG&E Call Center Performance Measure

According to the Staff Proposal, pursuant to D.04-10-034, PG&E is required to file quarterly reports concerning the timeliness of service provided by its customer service call centers. Item 14 of the Staff Proposal proposes changing the frequency of this report from quarterly to annual. There is nothing in D.04-10-034 that requires PG&E to file quarterly reports on its call center performance. In its SFI Comments, PG&E had cited to the text of Section 7.5(c) of D.04-10-034 but there is nothing in that section that requires quarterly reports on call center performance.

This ruling seeks comment on the following:

1. *Did D.04-10-034 impose PG&E's reporting requirement that is the subject of Item 14? If so, provide a citation and/or quotation from the decision where this reporting requirement can be found.*
2. *Was there a Commission decision or order other than D.04-10-034 that required PG&E to file the quarterly call center performance reports that are the subject of Item 14?*

PG&E Response To 8.4 Item 14: PG&E Call Center Performance Measure:

D.04-10-034 was issued to improve outage communication at the call centers and to reduce the duration of the outage. Ordering Paragraph 2 of D.04-10-034 stated that *PG&E shall implement Agreements 1, 2, 3, 4, 5, 8 and 9 of the PG&E/Office of Ratepayer Advocates (ORA) joint testimony, as described in Appendix A.* Agreement 3 of PG&E/ORA joint testimony (Appendix A) states that PG&E and ORA agree that no further reporting regarding major outages or excludable major events is required beyond the Commission's current requirements. (A.02-09-005; A.02-11-017; I.03-01-012)

Section 3.4 of D.04-10-034 references D.95-09-073 that required PG&E to implement specific improvement to its call center operations and emergency preparedness. Ordering

Paragraph 1 of D.95-09-073 states that PG&E shall *submit monthly reports on daily and monthly call center performance, consistent with reporting requirement for telephone utilities set forth in General Order 133*. Therefore the reporting requirement that is the subject of item 14 is derived from Ordering Paragraph 1 of D.95-09-073.

Section 3.5.e of General Order (GO) 133-C states that the reporting frequency for this report should be reported annually. After twenty years, PG&E believes that the more stringent requirement of monthly reports on call center performance is no longer required and has therefore requested that the report be submitted annually consistent with GO 133-C.

PG&E supports the Commission's efforts to reduce the administrative burden on both the utilities and its own resources. PG&E respectfully requests that the Draft Resolution be amended consistent with the comments above, for the reasons stated.

Respectfully Submitted,
SHIRLEY A. WOO

By: /s/ Shirley A. Woo

SHIRLEY A. WOO

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-2248
Facsimile: (415) 973-5520
E-Mail: SAW0@pge.com

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Attorney for
PACIFIC GAS AND ELECTRIC COMPANY